

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11  
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GLOBAL EAGLE ENTERTAINMENT : Case No. 20-11835 (JTD)  
INC., *et al.*,<sup>1</sup> :  
:  
Debtors. : (Jointly Administered)  
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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON  
AUGUST 17, 2020 AT 11:00 A.M. (ET)**

**ANY PARTY WISHING TO PARTICIPATE IN THE HEARING  
MUST APPEAR THROUGH BOTH COURTCALL AND ZOOM.**

**TO APPEAR BY VIDEO CONFERENCE,  
PARTIES SHOULD USE THE FOLLOWING INFORMATION:  
JOIN ZOOMGOVMEETING:**

**MEETING ID: <https://debuscourts.zoomgov.com/j/1614247418>  
PASSWORD: 842075**

**PLEASE NOTE: AUDIO MUST BE MUTED IN ZOOM ONCE CONNECTED.  
COURTCALL, LLC WILL PROVIDE THE AUDIO FOR THE HEARING.**

**TO APPEAR TELEPHONICALLY,  
PARTIES SHOULD CONTACT COURTCALL, LLC  
AT 844-925-0626 TO REGISTER THEIR APPEARANCE.**

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number are: Global Eagle Entertainment Inc. (7800), Airline Media Productions Inc. (2314), Emerging Markets Communications, LLC (0735), Entertainment in Motion, Inc. (3908), Global Eagle Entertainment Operations Solutions, Inc. (3375), Global Eagle Services, LLC (7899), Global Eagle Telecom Licensing Subsidiary LLC (2547), IFE Services (USA), Inc. (2120), Inflight Productions USA, Inc. (8493), Maritime Telecommunications Network, Inc. (9974), MTN Government Services, Inc. (6069), MTN International, Inc. (8559), MTN License Corp. (0314), N44HQ, LLC (0570), Post Modern Edit, Inc. (6256), Row 44, Inc. (2959), and The Lab Aero, Inc. (9831). The Debtors' address is 6080 Center Drive, Suite 1200, Los Angeles, California 90045.

**MATTERS UNDER CERTIFICATION**

1. Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Record Date for Notice and Sell-Down Procedures for Transferring Claims Against the Debtors and (II) Granting Related Relief [[D.I. 8](#), 7/22/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET)

Objections Received: None

Related Documents:

- A. Interim Order (I) Establishing Record Date for Notice and Sell-Down Procedures for Transferring Claims Against the Debtors and (II) Granting Related Relief [[D.I. 78](#), 7/23/20]
- B. Omnibus Notice of First Day Pleadings and Final Hearing Thereon [[D.I. 89](#), 7/24/20]
- C. Notice of (I) Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors and (II) Final Hearing [[D.I. 93](#), 7/24/20]
- D. Certification of Counsel [[D.I. 173](#), 8/13/20]

Status: A certification of counsel has been filed. No hearing is required unless the Court has questions.

2. Motion of Debtors for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (II) Approving Proposed Adequate Assurance of Payment, (III) Establishing Procedures for Resolving Requests for Additional Assurance of Payment, and (IV) Granting Related Relief [[D.I. 10](#), 7/22/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET)

Objections Received:

- A. Informal Comments from the Committee
- B. Informal Comments from the Ad Hoc DIP and First Lien Lender Group

Related Documents:

- A. Interim Order (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (II) Approving Proposed Adequate Assurance of Payment, (III) Establishing Procedures for Resolving Requests for Additional Assurance of Payment, and (IV) Granting Related Relief [[D.I. 80](#), 7/23/20]

B. Omnibus Notice of First Day Pleadings and Final Hearing Thereon [[D.I. 89](#), 7/24/20]

C. Certification of Counsel [[D.I. 176](#), 8/13/20]

Status: A certification of counsel has been filed. No hearing is required unless the Court has questions.

3. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees, and (II) Granting Related Relief [[D.I. 11](#), 7/22/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET)

Objections Received:

A. Informal Comments from the Committee

B. Informal Comments from the Ad Hoc DIP and First Lien Lender Group

Related Documents:

A. Interim Order (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief [[D.I. 81](#), 7/23/20]

B. Omnibus Notice of First Day Pleadings and Final Hearing Thereon [[D.I. 89](#), 7/24/20]

C. Certification of Counsel [[D.I. 175](#), 8/13/20]

Status: A certification of counsel has been filed. No hearing is required unless the Court has questions.

4. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Maintain their Insurance Policies and Programs and (B) Honor All Insurance Obligations, Including Obligations Under their Premium Finance Agreements, (II) Modifying Automatic Stay, and (III) Granting Related Relief [[D.I. 12](#), 7/22/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET), extended to August 14, 2020 at 4:00 p.m. (ET) for the Committee

Objections Received:

A. Informal Comments from the Committee

B. Informal Comments from the Chubb Companies

C. Informal Comments from the Ad Hoc DIP and First Lien Lender Group

Related Documents:

- A. Interim Order (I) Authorizing Debtors to (A) Continue to Maintain Their Insurance Policies and Programs and (B) Honor All Insurance Obligations, Including Obligations Under their Premium Finance Agreements, (II) Modifying Automatic Stay, and (III) Granting Related Relief [[D.I. 82](#), 7/23/20]
- B. Omnibus Notice of First Day Pleadings and Final Hearing Thereon [[D.I. 89](#), 7/24/20]
- C. Certification of Counsel [[D.I. 174](#), 8/13/20]

Status: A certification of counsel has been filed. No hearing is required unless the Court has questions.

- 5. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Prepetition Claims of (A) Critical Vendors, (B) Lien Claimants, (C) 503(b)(9) Claimants, and (D) Foreign Vendors, (II) Confirming Administrative Expense Priority Status for Outstanding Prepetition Purchase Orders, and (III) Granting Related Relief [[D.I. 14](#), 7/22/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET), extended to August 14, 2020 at 4:00 p.m. (ET) for the Committee

Objections Received:

- A. Informal Comments from the Committee

Related Documents:

- A. Interim Order (I) Authorizing Debtors to Pay Prepetition Claims of (A) Critical Vendors, (B) Lien Claimants, (C) 503(b)(9) Claimants, and (D) Foreign Vendors, (II) Confirming Administrative Expense Priority Status for Outstanding Prepetition Purchase Orders, and (III) Granting Related Relief [[D.I. 84](#), 7/23/20]
- B. Omnibus Notice of First Day Pleadings and Final Hearing Thereon [[D.I. 89](#), 7/24/20]
- C. Certification of Counsel [[D.I. 178](#), 8/13/20]

Status: A certification of counsel has been filed. No hearing is required unless the Court has questions.

6. Debtors' Motion for Entry of an Order Authorizing the Filing Under Seal of Proposed Debtor-in-Possession Financing Fee Letter [[D.I. 66](#), 7/22/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET)

Objections Received: None

Related Documents:

- A. Notice of Motion [[D.I. 94](#), 7/24/20]
- B. [SEALED] Fee Letter [[D.I. 103](#), 7/29/20]
- C. Notice of Filing of Redacted Debtor-in-Possession Financing Fee Letter [[D.I. 104](#), 7/29/20]
- D. Certificate of No Objection [[D.I. 172](#), 8/13/20]

Status: A certificate of no objection has been filed. No hearing is required unless the Court has questions.

#### **CONTESTED MATTERS GOING FORWARD**

7. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue Operating Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief [[D.I. 5](#), 7/22/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET), extended to August 14, 2020 at 4:00 p.m. (ET) for the Committee

Objections Received:

- A. Informal Comments from the Committee

Related Documents:

- A. Interim Order (I) Authorizing Debtors to (A) Continue Operating Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief [[D.I. 75](#), 7/23/20]
- B. Omnibus Notice of First Day Pleadings and Final Hearing Thereon [[D.I. 89](#), 7/24/20]

Status: The Debtors are working to resolve certain of the objections and expect to submit a revised form of order under certification of counsel before the Hearing.

8. Motion of Debtors for Entry of Interim and Final Orders Authorizing Debtors to (I) Pay Prepetition Workforce Obligations, (II) Maintain Compensation and Benefits Programs, and (III) Granting Related Relief [[D.I. 13](#), 7/22/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET), extended to August 14, 2020 at 4:00 p.m. (ET) for the Committee

Objections Received:

- A. Informal Comments from the Office of the United States Trustee
- B. Informal Comments from the Committee
- C. Informal Comments from the Ad Hoc DIP and First Lien Lender Group

Related Documents:

- A. Interim Order Authorizing Debtors to (I) Pay Prepetition Workforce Obligations, (II) Maintain Compensation and Benefits Programs, and (III) Granting Related Relief [[D.I. 83](#), 7/23/20]
- B. Omnibus Notice of First Day Pleadings and Final Hearing Thereon [[D.I. 89](#), 7/24/20]
- C. Supplemental Declaration of Christian M. Mezger in Support of Motion of Debtors for Entry of Interim and Final Orders Authorizing Debtors to (I) Pay Prepetition Workforce Obligations, (II) Maintain Compensation and Benefits Programs, and (III) Granting Related Relief [[D.I. 107](#), 8/4/20]<sup>2</sup>

Status: The Debtors are working to resolve certain of the objections and expect to submit a revised form of order under certification of counsel before the Hearing.

9. Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notice and Hearing Procedures for Trading of Global Eagle Entertainment Inc. Equity Securities and (II) Granting Related Relief [[D.I. 9](#), 7/22/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET)

Objections Received:

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<sup>2</sup> The location of this declarant is Denver, CO.

- A. Informal Comments from the Committee
- B. Nantahala Capital Management, LLC's Objection to Motion of Debtors for Entry of a Final Order (I) Establishing Procedures for Trading of Global Eagle Entertainment Inc. Equity Securities, and (II) Granting Related Permanent Injunctive Relief [[D.I. 111](#), 8/6/20]

Related Documents:

- A. Interim Order (I) Establishing Notice and Hearing Procedures for Trading of Global Eagle Entertainment Inc. Equity Securities and (II) Granting Related Relief [[D.I. 79](#), 7/23/20]
- B. Omnibus Notice of First Day Pleadings and Final Hearing Thereon [[D.I. 89](#), 7/24/20]
- C. Notice of Interim Order (I) Establishing Notice and Hearing Procedures for Trading of Global Eagle Entertainment Inc. Equity Securities and (II) Granting Related Relief [[D.I. 92](#), 7/24/20]
- D. Reply of Debtors in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notice and Hearing Procedures for Trading of Global Eagle Entertainment Inc. Equity Securities and (II) Granting Related Relief [[D.I. 166](#), 8/12/20]
- E. Joinder and Reply of Ad Hoc DIP and First Lien Lender Group in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notice and Hearing Procedures for Trading of Global Eagle Entertainment Inc. Equity Securities and (II) Granting Related Relief [[D.I. 167](#), 8/12/20]
- F. Notice of Filing of Revised Proposed Final Order [[D.I. 177](#), 8/13/20]

Status: The informal comments of the Committee have been resolved. This matter will be going forward as to Nantahala Capital Management, LLC's objection.

- 10. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Claims, (IV) Granting Adequate Protection, (V) Modifying Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [[D.I. 40](#), 7/22/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET)

Objections Received:

- A. Informal Comments from the Ad Hoc DIP and First Lien Lender Group
- B. Informal Comments from the DIP Agent
- C. Informal Comments from the Chubb Companies
- D. Statement and Reservation of Rights of Citizen Bank, National Association Concerning Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Claims, (IV) Granting Adequate Protection, (V) Modifying Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [[D.I. 128](#), 8/10/20]
- E. Objection of Official Committee of Unsecured Creditors to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Claims, (IV) Granting Adequate Protection, (V) Modifying Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [[D.I. 163](#), 8/12/20]

Related Documents:

- A. Declaration of Neil A. Augustine [Exhibit B to [D.I. 40](#)]<sup>3</sup>
- B. Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Claims, (IV) Granting Adequate Protection, (V) Modifying Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [[D.I. 85](#), 7/23/20]
- C. Omnibus Notice of First Day Pleadings and Final Hearing Thereon [[D.I. 89](#), 7/24/20]

Status: The informal comments of the Ad Hoc DIP and First Lien Lender Group, the DIP Agent and the Chubb Companies have been resolved. The Debtors expect to submit a revised form of final order before the Hearing. The Debtors also anticipate filing a reply to the objection of the Committee and a motion for leave to file a late reply. This matter will be going forward as an evidentiary hearing. The Debtors intend to file a witness list in advance of the Hearing.

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<sup>3</sup> The location of this declarant is New York, NY.



11. Motion of Debtors for Entry of Orders (I) Authorizing and Approving Bidding Procedures, (II) Scheduling an Auction and a Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice and Procedures for the Assumption and Assignment of Certain Executory Contracts and Leases, and (V) Granting Related Relief [[D.I. 95](#), 7/24/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET), extended for the Committee to August 12, 2020 at 11:00 a.m. (ET)

Objections Received:

- A. Limited Objection of the Chubb Companies to Motion of Debtors for Entry of Orders (I) Authorizing and Approving Bidding Procedures, (II) Scheduling an Auction and a Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice and Procedures for the Assumption and Assignment of Certain Executory Contracts and Leases, and (V) Granting Related Relief [[D.I. 114](#), 8/7/20]
- B. Opposition to Motions of the Debtors for Entry of Order (I) Extending Time to File (A) Schedules and Statements of Financial Affairs and (B) Rule 2015.3 Reports and (II) Granting Related Relief and for Entry of Orders (I) Authorizing and Approving Bidding Procedures, (II) Scheduling an Auction and a Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice and Procedures for the Assumption and Assignment of Certain Executory Contracts and Leases, and (V) Granting Related Relief [[D.I. 122](#), 8/10/20]
- C. Objection of Cigna Entities to Motion of Debtors for Entry of Order (I) Extending Time to File (A) Schedules and Statements of Financial Affairs and (B) Rule 2015.3 Reports and (II) Granting Related Relief and for Entry of Orders (I) Authorizing and Approving Bidding Procedures, (II) Scheduling an Auction and a Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice and Procedures for the Assumption and Assignment of Certain Executory Contracts and Leases, and (V) Granting Related Relief [[D.I. 123](#), 8/10/20]
- D. Limited Objection and Reservation of Rights of Paramount Pictures Corporation to Debtors' Sale Motion [[D.I. 133](#), 8/10/20]
- E. Objection of the Official Committee of Unsecured Creditors to the Motion of Debtors for Entry of Orders (I) Authorizing and Approving Bidding Procedures, (II) Scheduling an Auction and a Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice and Procedures for the Assumption and Assignment of Certain Executory Contracts and Leases, and (V) Granting Related Relief [[D.I. 161](#), 8/12/20]

- i) Declaration of Michael J. Genereux in Support of Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Approval of Bidding Procedures [[D.I. 162](#), 8/12/20]<sup>4</sup>

F. Informal Comments from Broward County, Florida

Related Documents:

- A. Declaration of Neil A. Augustine in Support of the Debtors' Motion for Entry of Orders (I) Authorizing and Approving Bidding Procedures, (II) Scheduling an Auction and a Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice Procedures for the Assumption and Assignment of Certain Executory Contracts and Leases, and (V) Granting Related Relief [[D.I. 125](#), 8/10/20]<sup>5</sup>

Status: The Debtors are working to resolve certain of the objections and expect to submit a revised form of order before the Hearing. The Debtors also anticipate filing a reply to the objection of the Committee and a motion for leave to file a late reply. This matter will be going forward as an evidentiary hearing. The Debtors intend to file a witness list in advance of the Hearing.

- 12. Motion of Debtors for Entry of Order (I) Extending Time to File (A) Schedules and Statements of Financial Affairs and (B) Rule 2015.3 Reports and (II) Granting Related Relief [[D.I. 99](#), 7/27/20]

Objection Deadline: August 10, 2020 at 4:00 p.m. (ET)

Objections Received:

- A. Informal Comments from the Office of the United States Trustee
- B. BMG Rights Management (US) LLC's Opposition to Motions of the Debtors for Entry of Order (I) Extending Time to File (A) Schedules and Statements of Financial Affairs and (B) Rule 2015.3 Reports and (II) Granting Related Relief and for Entry of Orders (I) Authorizing and Approving Bidding Procedures, (II) Scheduling an Auction and a Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice and Procedures for the Assumption and Assignment of Certain Executory Contracts and Leases, and (V) Granting Related Relief [[D.I. 122](#), 8/10/20]

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<sup>4</sup> The location of this declarant is New York, NY.

<sup>5</sup> The location of this declarant is New York, NY.

Related Documents:

- A. Notice of Filing of Revised Proposed Order [[D.I. 179](#), 8/13/20]

Status: The informal comments of the Office of the United States Trustee have been resolved. This matter will be going forward.

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Dated: August 13, 2020  
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

/s/ Kara Hammond Coyle

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*Proposed Counsel for Debtors and Debtors in Possession*